

McMANIMON, SCOTLAND & BAUMANN, LLC
427 Riverview Plaza
Trenton, New Jersey 08611
(609) 695-6070
Andrea Dobin (adobin@msbnj.com)
Michele M. Dudas, Esq. (mdudas@msbnj.com)
Attorneys for Thomas J. Orr, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

JOHN MICHAEL WALSH and
ROSEMARY JOANNE WALSH,

Debtors.

Case No. 19-13567 (KCF)

Honorable Kathryn C. Ferguson,
Chief U.S.B.J.

Chapter 7

Hearing Date and Time:
July 7, 2020, at 10:00 a.m.

**NOTICE OF MOTION OF THOMAS J. ORR, CHAPTER 7
TRUSTEE, FOR AN ORDER FURTHER EXTENDING TIME
TO OBJECT TO DEBTORS' DISCHARGE PURSUANT TO
11 U.S.C. § 727 AND FOR SANCTIONS**

PLEASE TAKE NOTICE that on **July 7, 2020, at 10:00 a.m.** or as soon thereafter as the movant may be heard, Thomas J. Orr, Chapter 7 Trustee (the "Trustee") in the bankruptcy proceeding of John Michael Walsh and Rosemary Joanne Walsh, will move before the Honorable Kathryn C. Ferguson, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court, U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an order further extending the time to object to the Debtors' discharge and for sanctions (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Trustee will rely upon the enclosed Certification of the Trustee in support of the relief requested.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that as the Motion does not involve any complex issue of law, no brief is required.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed unopposed and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

McMANIMON, SCOTLAND & BAUMANN, LLC
Counsel to Thomas J. Orr, Chapter 7 Trustee

Dated: June 16, 2020

By: /s/ Michele M. Dudas
MICHELE M. DUDAS